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VIA ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Bonny Gas Transport Ltd v. O.W. Bunker Germany GmbH*, 14-cv-9542
Hapag-Lloyd AG v. U.S. Oil Trading LLC, 14-cv-9949
Hapag-Lloyd AG v. O'Rourke Marine Services L.P., 14-cv-10027
U.S. Oil Trading LLC v. M/V Vienna Express and M/V Sofia Express, 15-cv-6718
Bonny Gas Transport Ltd v. O.W. Bunker Germany GmbH, 16-cv-01765

Dear Judge Caproni:

We represent O.W. Bunker Germany GmbH ("OWG"), together with our co-counsel Hill Rivkins LLP, in the above-referenced actions (the "Civil Actions").

On March 3, 2016, the Court held a status hearing to discuss, among other things, OWG's motion to confirm the standing order of reference, as well as the cross-motions filed by Nustar Terminals Marine Services N.V. ("Nustar"), Hapag-Lloyd Aktiengesellschaft, and U.S. Oil Trading LLC to withdraw the reference of the Civil Actions to this Court. At the hearing, OWG argued that the cross-motions were procedurally improper because they were not filed in the bankruptcy court, in violation of the local bankruptcy rules.

Nustar subsequently re-filed its cross-motion for withdrawal of the reference in the bankruptcy court on March 8, 2016. Pursuant to the bankruptcy court's standard procedures, the cross-motion was transmitted to the District Court, where it was assigned case number 16-cv-01765. The case was then referred to Your Honor as related to the Civil Actions.

Out of an abundance of caution, we hereby request that the Court consider the arguments raised in OWG's opposition to the cross-motions, a docket-stamped copy of which is attached hereto as **Exhibit A**, in opposition to Nustar's re-filed cross-motion in case number 16-cv-01765. Alternatively, if the Court wishes for OWG to submit its opposition as a separate docket entry in case number 16-cv-01765, we will do so.

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We thank the Court for its attention to this matter and stand ready to answer any questions that Your Honor may have.

Respectfully submitted,

/s/ Darren Azman

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